REMARKS

Claims 1-13, 15-18, 20-21, 23-27 and 39-64 are pending prior to entering this amendment. The examiner rejects claims 1-3, 9-15, 18, 20-21, 28-35, 37, 39, 40, 46-53, 56-57, 63 and 64 under 35 USC §103(a) as unpatentable over Michel (U.S. Patent No. 6,215,562) in view of Spence (U.S. Patent No. 5,333,069). The examiner rejects claims 4-6, 23-25, 41-43 and 58-60 under 35 USC §103(a) as unpatentable over Michel in view of Spence and Sawano (U.S. Patent No. 6,394,895). The examiner rejects claims 7, 16, 17, 26, 36, 44, 54, 55 and 61 under 35 USC §103(a) as unpatentable over Michel in view of Spence and Yamaguchi (U.S. Patent No. 6,788,431). The examiner rejects claims 8, 27, 45 and 62 under 35 USC §103(a) as unpatentable over Michel in view of Spence and Housel (U.S. Patent Application Publication No. 2003/0164960). Applicant amends claims 1, 2, 29, 32-34, 47, and, 50-52, cancels claims 30-31 and 48-49, and adds claims 65-66. Claims 1-13, 15-18, 20-21, 23-29, 32-37, 39-47, and 50-66 remain after entering this amendment. Applicant adds no new matter and requests reconsideration.

Examiner Interview Summary

Applicant thanks Examiner Pokrzawa for granting and conducting an Applicant-initiated interview. Although no agreement was reached regarding the claims, as a result of the interview the Applicant clearly understands the examiner's claim rejections.

Claim Rejections – 35 U.S.C. § 103

The examiner deems claims 1-13, 15-18, 20-21, 23-37 and 39-62 as obvious over Michel and Spence variously in view of Shawano, Yamaguchi, and Housel. Applicant respectfully traverses the Examiner's rejections.

Applicant discloses a printing system that characterizes multiple printing media to be printed on by a printing device. The printing media are characterized through the calibration of one or more adjustable settings of a printing device. The printing system retains these multiple media characterizations in a memory for subsequent use by the printing device.

Claim 18 recites *storing multiple sets of printer settings in a memory, each set characterizing a different printing medium*. Claim 1 similarly recites *a memory to store multiple*

configurations of the adjustable settings, each configuration of the adjustable settings corresponding to a different printing medium.

Applicant agrees with the examiner that Michel does not teach or suggest above recited limitations. According to the examiner, Spence's data storage device 350 discloses the recited memory. The examiner appears to argue that Spence's solid area densities and half tone dot sizes disclose both the recited printer settings and adjustable settings. The data storage device 350, however, does not store any configurations of the solid area densities and half tone dot sizes. See, Spence, col. 16, lines 15-31; col. 25, lines 22-26, where the data storage device 350 stores values (process color solid density changes and process color tint density changes) that represent adjustments that may be made to the solid area densities and half tone dot sizes. Put differently, Spence teaches storing solid and tint density changes, which may subsequently be used by a human technician to manually adjust the solid area densities and half tone dot sizes of Spence's proofing system 140, not to store settings of the solid area densities and half tone dot sizes themselves as the claims require.

There is further no disclosure in Spence of configuring or setting the solid area densities and half tone dot sizes to characterize a printing medium. See, Spence, col. 14, lines 41-49, where Spence performs its proofing system 140 calibration method to compensate for the image processing differences of between the proofing system 140 and the target system 160. In other words, Spence's calibration method adjusts the proofing system 140 so that its proof images 150 are substantially similar to target images 170 from the target system 160 when printed on paper with the same characteristics, even though the proofing system 140 and the target system 160 have significantly different printing operations. Since Spence does not teach or suggest setting the solid area densities and half tone dot sizes to characterize any printing medium, much less storing multiple sets that each characterize different printing mediums, Spence does not anticipate claims 1 and 18, or their corresponding dependent claims.

Claim 18 recites *identifying a plurality of second calibration values for a second setting of the printing device after receiving the first feedback input.* Claims 2 and 37 recite similar limitations. Claim 56 similarly recites *selecting a second setting of the printing device for calibration with the printing medium after the entering of the first feedback input in the memory.* According to the Examiner, Michel's printer calibration method shown in Figures 3A and 3B discloses these limitations. The Examiner appears to allege two of Michel's cyan, magenta, and

yellow color ink responses disclose the recited first and second settings. Michel's "Gray Balance" printer calibration method, however, calibrates the cyan, magenta, and yellow color ink responses simultaneously with a single "Apply Changes" input, not separate and distinct feedback inputs as the claims require. Since Michel calibrates all of the color ink responses simultaneously, not sequentially as the claims require, Michel does not teach or suggest the recited second setting. Michel therefore does not anticipate claims 2, 18, 37, and 56, or their corresponding dependent claims.

Claim 18 further recites *receiving a first feedback input that identifies one of the first calibration values as preferred for the first setting*, and *receiving a second feedback input that identifies one of the second calibration values as preferred for the second setting*. Claims 2, 37, and 56 recite similar limitations. According to the Examiner, Michel's "Gray Balance" printer calibration method shown in Figures 3A and 3B disclose the recited limitations. The Examiner appears to allege two of Michel's cyan, magenta, and yellow color ink responses disclose the recited first and second settings. Michel however teaches a single "Apply Changes" input for calibration of the cyan, magenta, and yellow color ink responses, not separate and distinct feedback inputs as the claims require. Since Michel does not teach or suggest the recited second setting of the printing device that is calibrated separate and distinctly from the first setting, Michel does not anticipate claims 2, 18, 37, and 56 or their corresponding dependent claims.

Claim 1 recites *a controller... adapted to identify a plurality of first calibration values for a first setting of the adjustable settings through derivation of at least one trigger value*. Claims 29 and 47 recite similar limitations. The Examiner alleges Michel's printer engine 10 discloses the recited controller. The Examiner appears to argue Michel's patches of a printed Limits page disclose the recited first calibration values. There is no disclosure in Michel of deriving the patches of the Limits page, much less from the recited trigger value. Michel, col. 7, lines 59-60, where Michel prints copies of the Limits page which are stored in the target memory 50.

To further crystallize this distinction the Applicant amends claims 1, 29, and 47 to clarify that the recited derivation includes *incrementing the trigger value by at least a preset or user-defined incremental value*. Since there is no disclosure in Michel or Spence of incrementing any trigger value by an incremental value to derive any of the patches on the Limits page, Michel does not anticipate claims 1, 29, and 47, and their corresponding dependent claims.

Claim 37 recites *receiving a media identifier that uniquely identifies the first printing medium* and *compiling a data file in a memory that includes the first and second feedback inputs and the media identifier, where the media identifier indicates that the first and second feedback inputs correspond to the first printing medium*. Claim 56 recites *storing a media identifier that uniquely identifies the printer medium in the memory, where the media identifier indicates that the first and second feedback inputs correspond to the printing medium*.

Applicant agrees with the examiner, that Michel fails to expressly disclose the recited media identifier and data file. The examiner appears to allege Spence's root file name and Aim file disclose the recited media identifier and data file, respectively. The root file name, however, identifies the halftone separations 120 used to generate the proof image 150, not the medium on which the proof image 150 is printed. See, Spence, col. 30, line 12-19, among other places. Spence further teaches that the Aim file includes data (control point data and interpolated data) calculated by Spence's computer 320, not feedback inputs received by the computer 320 and that indicate which calibration value among a plurality of calibration values is preferred for a printing medium as the claims require. See, Spence, FIG. 11B, blocks 1155, 1160, and 1170. Spence therefore does not anticipate claims 37 and 56, or their corresponding dependent claims.

Neither Michel nor Spence further provide any motivation to combine the inventions described therein. The Examiner alleges since both Michel and Spence teach "systems that calibrate a printing system," that "[i]t would have been obvious to a person of ordinary skill in the art to include settings stored in a memory that correspond to different printing mediums, as taught by Spence, the system of Michel." Office Action, page 11. Even if Spence taught the recited *media identifier* and *data file*, this combination would not have provided motivation for Michel to include the media identifier and data file within its system, as neither Michel nor Spence calibrate their printing systems to characterize any specific media. Thus combining the references, as the Examiner suggests, is to no avail. Applicant therefore respectfully requests that this rejection be withdrawn and the pending claims be allowed to issue.

Claim 63 recites *the controller characterizes a printing medium that is a non-white paper or a transparency*. Neither Michel nor Spence characterize a printing medium that is *non-white paper or transparency*. For instance, Michel's "Gray Balance" printer calibration method requires its Limits page to be printed on white paper, not on a non-white paper or a transparency as the claim requires. See, Michel, col. 5, lines 38-60. Spence further teaches calibrating its

proofing system 140 to compensate for image processing differences with the target system 160, not to characterize a printing medium. See Spence, col. 14, lines 41-49. Put differently, there is no disclosure in Spence of calibrating its proofing system 140 for any printing medium, much less *non-white paper or a transparency* as the claim requires. Michel and Spence therefore does not anticipate claim 63.

Claim 64 recites *the controller receives the trigger value from the interface*, and *the trigger value is one of the first calibration values*. The examiner alleges Spence's computer 320 discloses the recited controller. The examiner appears to argue that Spence's user input discloses the recited trigger value. The user input, however, prompts the execution of one or more operation within Spence's Color Calibration Manager Main routine, and thus are not one of the recited first calibration values for a first setting of the adjustable settings. See, Spence, FIG. 7. Nothing in Michel cures this deficiency, as there is no disclosure of Michel's printer engine 10 receiving any of the calibration values from Michel's keypad 20. The combination of Spence and Michel therefore does not anticipate claim 64.

New Claims

The Applicant adds claim 65 which depends from independent claim 1, and claim 66 which depends from claim 66. Claim 65 recites *the controller is adapted to receive the sample value from the interface, where the sample value to identify a number of first calibration values to be derived by the controller*. Claim 66 recites *where the sample value identifies a maximum first calibration value, where the controller to cease incrementing the trigger value when one of the derived first calibration values is greater than or equal to the maximum first calibration value*. There is no disclosure in Spence or Michel of any sample value received from an interface that specifies the number of first calibration values to be derived by Spence's computer 320 or Michel's printer engine 10, much less receiving a sample value that identifies when the computer 320 or Michel's printer engine 10 is to cease incrementing the recited trigger value. The combination of Spence and Michel therefore does not anticipate claims 65 and 66.

CONCLUSION

For the foregoing reasons, reconsideration and allowance of all claims remaining after amending the application is solicited. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

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